

<p>In re:</p> <p>Juan Claudio, Maria Cristina Quinones, Debtors.</p> <p>Nationstar Mortgage LLC, Movant,</p> <p>v.</p> <p>Juan Claudio, Maria Cristina Quinones, Debtors/Respondents,</p> <p>Kenneth E. West, Esquire, Trustee/Respondent.</p>	<p>Bankruptcy No. 23-11033-pmm</p> <p>Chapter 13</p> <p>Related to Doc. No. 2</p>
--	---

Secured creditor, Nationstar Mortgage LLC (“Nationstar”) by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtors, Juan Claudio and Maria Cristina Quinones, and in support thereof alleges as follows:

- 23-113246  
CLAUDIO,JUAN & QUINONES,MARIA  
Objection to Confirmation  
Page 1

4. Upon review of internal records, it is anticipated that Nationstar's Proof of Claim will include a pre-petition arrearage of approximately \$860.21. A true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On April 10, 2023, Debtors filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full anticipated pre-petition arrearage of \$860.21, as it provides a total of \$0.00 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) Nationstar hereby objects to Debtors' proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Movant, Nationstar Mortgage LLC ("Nationstar"), respectfully requests that this Court not confirm the Chapter 13 Plan of Debtors, Juan Claudio and Maria Cristina Quinones.

Date: May 19, 2023

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**  
Attorney for Secured Creditor  
130 Clinton Road, Suite 202, Lobby B  
Fairfield, NJ 07004

Telephone: 973-575-0707  
Fax: 973-404-8886  
By: /s/Charles Wohlrab  
Charles Wohlrab, Esquire  
Pennsylvania Bar Number 314532  
Email: CWohlrab@raslg.com

<p>In re:</p> <p>Juan Claudio, Maria Cristina Quinones, Debtors.</p> <p>Nationstar Mortgage LLC, Movant,</p> <p>v.</p> <p>Juan Claudio, Maria Cristina Quinones, Debtors/Respondents,</p> <p>Kenneth E. West, Esquire, Trustee/Respondent.</p>	<p>Bankruptcy No. 23-11033-pmm</p> <p>Chapter 13</p> <p>Related to Doc. No. 2</p>
--	---

**I HEREBY CERTIFY** that on May 19, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Kenneth E. West  
Office Of The Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

23-113246  
CLAUDIO,JUAN & QUINONES,MARIA  
Objection to Confirmation  
Page 4

Juan Claudio  
501 Welsh Road  
Philadelphia, PA 19115

Maria Cristina Quinones  
501 Welsh Road  
Philadelphia, PA 19115

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

Attorney for Secured Creditor  
130 Clinton Road, Suite 202, Lobby B  
Fairfield, NJ 07004

Telephone: 973-575-0707

Fax: 973-404-8886

By: /s/Charles Wohlrab

Charles Wohlrab, Esquire

Pennsylvania Bar Number 314532

Email: CWohlrab@raslg.com